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**COUNSEL TO THE DEBTORS AND
DEBTORS IN POSSESSION**

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	Chapter 11
Senior Care Centers, LLC, <i>et al.</i> ¹	§	Case No. 18-33967 (BJH)
Debtors.	§	(Jointly Administered)
	§	

**NOTICE OF AGENDA OF MATTERS SCHEDULED
FOR HEARING ON AUGUST 7, 2019 AT 9:30 A.M. (CT)**

MATTERS GOING FORWARD

1. Motion of Debtors for Entry of an Order (I) Approving the Disclosure Statement; (II) Establishing Procedures for the Solicitation and Tabulation of Votes to Accept or Reject the Plan; (III) Scheduling a Confirmation Hearing; (IV) Approving Related Notice Procedures; and (V) Granting Related Relief [Docket No. 1427; Filed 06/24/2019]

Objection Deadline: July 22, 2019

Related Document(s):

- a) Disclosure Statement for the Debtors' Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Docket No. 1425; Filed 06/24/2019]

¹ The Debtors in the Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are set forth in the *Order (I) Directing Joint Administration of Chapter 11 Cases, and (II) Granting Related Relief* [Docket No. 569] and may also be found on the Debtors' claims agent's website at <https://omnimgt.com/SeniorCareCenters>. The location of the Debtors' service address is 600 North Pearl Street, Suite 1100, Dallas, Texas 75201.

- b) Debtors' Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Docket No. 1426; Filed 06/24/2019]
- c) Debtors' List of Witnesses and Exhibits for July 30, 2019 Hearing [Docket No. 1626; Filed 07/25/2019]
- d) POTA JV, LLC's Witness and Exhibit List for July 30, 2019 Hearing [Docket No. 1628; Filed 07/26/2019]
- e) TXMS Real Estate Investments, Inc.'s List of Witnesses and Exhibits for July 30, 2019 Hearing [Docket No. 1629; Filed 07/26/2019]
- f) List of Witnesses and Exhibits for July 30, 2019 Hearing Filed by Cedar Park Healthcare, LLC [Docket No. 1633; Filed 07/26/2019]
- g) Independent Landlords' Witness and Exhibit List [Docket No. 1634; Filed 07/26/2019]
- h) Second Amended Notice of (I) Hearing to Approve Disclosure Statement and (II) Deadline for Filing Objections to Approval of the Disclosure Statement [Docket No. 1635; Filed 07/26/2019]
- i) First Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Docket No. 1684; Filed 08/02/2019]
- j) Disclosure Statement First Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Docket No. 1685; Filed 08/02/2019]
- k) Notice of Filing of First Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Docket No. 1686; Filed 08/02/2019]
- l) Notice of Filing of Disclosure Statement for the First Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Docket No. 1687; Filed 08/02/2019]
- m) Debtors' List of Witnesses and Exhibits for August 7, 2019 Hearing [Docket No. 1692; Filed 08/06/2019]

Response(s) Received:

- a) Objection of Cedar Park Healthcare, LLC to the Debtors' Disclosure Statement and Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Docket No. 1578; Filed 07/22/2019]
- b) CIBC Bank USA's Objection to the Debtors' Disclosure Statement [Docket No. 1579; Filed 07/22/2019]

- c) Objection of Love Funding Corporation to the Motion of Debtors for Entry of an Order (I) Approving the Disclosure Statement; (II) Establishing Procedures for the Solicitation and Tabulation of Votes to Accept or Reject the Plan; (III) Scheduling a Confirmation Hearing; (IV) Approving Related Notice Procedures; and (V) Granting Related Relief [Docket No. 1586; Filed 07/22/2019]
- d) POTA JV, LLC's Objection to the Approval of the Disclosure Statement for the Debtors' Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Docket No. 1587; Filed 07/22/2019]
- e) Letter of Aaron Allison [Docket No. 1588; Filed 07/22/2019]
- f) TXMS Real Estate Investment, Inc.'s Objection to the Motion of Debtors for Entry of an Order (I) Approving the Disclosure Statement; (II) Establishing Procedures for the Solicitation and Tabulation of Votes to Accept or Reject the Plan; (III) Scheduling a Confirmation Hearing; (IV) Approving Related Notice Procedures; and (V) Granting Related Relief [Docket No. 1589; Filed 07/22/2019]
- g) The United States of America's Objection to (A) Debtors' Disclosure Statement and (B) Debtors' Motion for Entry of an Order (I) Approving the Disclosure Statement; (II) Establishing Procedures for the Solicitation and Tabulation of Votes to Accept or Reject the Plan; (III) Scheduling a Confirmation Hearing; (IV) Approving Related Notice Procedures; and (V) Granting Related Relief [Docket No. 1590; Filed 07/22/2019]
- h) United States Trustee's Objection to Disclosure Statement for the Debtors' Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Docket No. 1591; Filed 07/22/2019]
- i) Independent Landlords' Objection to the Disclosure Statement for the Debtors' Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Docket No. 1592; Filed 07/22/2019]
- j) Annaly / CHI Javelin Landlords' Objection to the Disclosure Statement for the Debtors' Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Docket No. 1594; Filed 07/22/2019]
- k) ORIX Real Estate Capital, LLC's Objection to the Debtors' Disclosure Statement [Docket No. 1596; Filed 07/22/2019]
- l) Granite Landlords Objection to and Joinder in Objections to the Disclosure Statement for the Debtors' Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Docket No. 1620; Filed 07/25/2019]

m) Texas Health and Human Services Commission's Response to Disclosure Statement Objections filed by the United States of America and the United States Trustee [Docket No. 1632; Filed 07/26/2019]

Status: This matter will go forward.

2. Debtors' Omnibus Motion for Entry of an Order (I) Authorizing the Debtors to Assume Unexpired Real Property Leases, (II) Establishing and Authorizing the Debtors to Pay Any Attendant Cure Amounts, or Such Other Amounts as Agreed, and (III) Granting Certain Related Relief [Docket No. 1479; Filed 07/02/2019]

Objection Deadline: July 23, 2019

Related Document(s):

a) Omnibus Notice of Hearing [Docket No. 1481; Filed 07/02/2019]

b) Debtors' List of Witnesses and Exhibits for August 7, 2019 Hearing [Docket No. 1692; Filed 08/06/2019]

Response(s) Received:

a) Objection of HC Hill Country Associates, Ltd., H-C Associates, Ltd., and HC-RW Associates, Ltd. to Debtors' Omnibus Motion for Entry of an Order (I) Authorizing the Debtors to Assume Unexpired Real Property Leases, (II) Establishing and Authorizing the Debtors to Pay any Attendant Cure Amounts, or Such Other Amounts as Agreed, and (III) Granting Certain Related Relief [Docket No. 1606; Filed 07/23/2019]

b) J-S Fredericksburg Realty, LP's Objection to Debtors' Omnibus Motion for Entry of an Order (I) Authorizing the Debtors to Assume Unexpired Real Property Leases, (II) Establishing and Authorizing the Debtors to Pay any Attendant Cure Amounts, or Such Other Amounts as Agreed, and (III) Granting Certain Related Relief [Docket No. 1607; Filed 07/23/2019]

c) Hidalgo Healthcare Realty, LLC's Objection to Debtors' Omnibus Motion for Entry of an Order (I) Authorizing the Debtors to Assume Unexpired Real Property Leases, (II) Establishing and Authorizing the Debtors to Pay any Attendant Cure Amounts, or Such Other Amounts as Agreed, and (III) Granting Certain Related Relief [Docket No. 1608; Filed 07/23/2019]

d) Annaly/CHI Javelin Landlords' Objection to Debtors' Omnibus Motion for Entry of an Order (I) Authorizing the Debtors to Assume Unexpired Real Property Leases, (II) Establishing and Authorizing the Debtors to Pay any Attendant Cure Amounts, or Such Other Amounts as Agreed, and (III) Granting Certain Related Relief [Docket No. 1609; Filed 07/23/2019]

- e) TXMS Real Estate Investments, Inc.'s Objection to the Debtors' Omnibus Motion for Entry of an Order (I) Authorizing the Debtors to Assume Unexpired Real Property Leases, (II) Establishing and Authorizing the Debtors to Pay any Attendant Cure Amounts, or Such Other Amounts as Agreed, and (III) Granting Certain Related Relief [Docket No. 1610; Filed 07/23/2019]
- f) Orix Real Estate Capital, LLC's Response to Debtors' Omnibus Motion for Entry of an Order (I) Authorizing the Debtors to Assume Unexpired Real Property Leases, (II) Establishing and Authorizing the Debtors to Pay any Attendant Cure Amounts, or Such Other Amounts as Agreed, and (III) Granting Certain Related Relief [Docket No. 1627; Filed 07/25/2019]
- g) Granite Landlords Reservation of Rights and Objection to the Debtors' Omnibus Motion for Entry of an Order (I) Authorizing the Debtors to Assume Unexpired Real Property Leases, (II) Establishing and Authorizing the Debtors to Pay any Attendant Cure Amounts, or Such Other Amounts as Agreed, and (III) Granting Certain Related Relief [Docket No. 1636; Filed 07/26/2019]

Status: This matter will go forward as a status conference.

3. Debtors Emergency Motion for an Order to Show Cause [Docket No. 1213; Filed 05/30/2019]

Related Document(s):

- a) Notice of Debtors Status Report Regarding Vendor Hold for May 31, 2019 [Docket No. 1223; Filed 5/31/2019]
- b) Notice of Debtors Status Report Regarding Vendor Hold for June 1, 2019 [Docket No. 1225; Filed 6/1/2019]
- c) Notice of Debtors Status Report Regarding Vendor Hold for June 2, 2019 [Docket No. 1226; Filed 6/2/2019]
- d) Order Granting Order to Show Cause [Docket No. 1229; Entered 6/3/2019]
- e) Motion of Debtors to Convert Show Cause Hearing On June 3, 2019 to a Status Conference and Reschedule Show Cause Hearing to June 11, 2019 [Docket No. 1248; Filed 6/3/2019]
- f) Order Granting Motion to Change the Show Cause Hearing Set 6/5/2019 to a Status Conference [Docket No. 1264; Entered 6/5/2019]
- g) Notice of Debtors Status Report Regarding Vendor Hold for June 6, 2019 [Docket No. 1286; Filed 6/6/2019]

- h) Notice of Debtors Status Report Regarding Vendor Hold for June 11, 2019 [Docket No. 1313; Filed 6/11/2019]
- i) Order Granting Motion to Continue Hearing [Docket No. 1316; Entered 6/11/2019]
- j) Notice of Debtors Status Report Regarding Vendor Hold for June 18, 2019 [Docket No. 1378; Filed 6/18/2019]
- k) Notice of Debtors Amended Status Report Regarding Vendor Hold for June 18, 2019 [Docket No. 1381; Filed 6/19/2019]
- l) Notice of Hearing Filed by Debtors [Docket No. 1558; Filed 07/18/2019]
- m) Debtors' List of Witnesses and Exhibits for August 7, 2019 Hearing [Docket No. 1692; Filed 08/06/2019]

Response(s) Received:

- a) Texas Health and Human Services Commission's Motion to Continue Show Cause Hearing, or in the Alternative, to Bifurcate Hearing [Docket No. 1236; Filed 6/3/2019]
- b) Status Report Regarding Prospective Payments From Managed Care Organizations [Docket No. 1245; Filed 6/3/2019]
- c) Texas Health and Human Services Commissions Motion to Continue Show Cause Hearing [Currently Set for June 11, 2019] and to Convert Evidentiary Hearing to Nonevidentiary Status Conference [Docket No. 1289; Filed 6/7/2019]
- d) Texas Health and Human Services Commission's Response to Order to Show Cause Entered Upon Debtors' Emergency Motion for an Order to Show Cause and Motion to Make More Definite and Certain [Docket No. 1298; Filed 6/10/2019]
- e) Texas Health and Human Services Commission's Supplemental Response to Debtors' Applications to Show Cause Why Texas Health and Human Services Should Not be Held in Contempt and Response to Further Status Report Dated June 19, 2019 [Docket No. 1417; Filed 6/24/2019]
- f) Texas Health and Human Services Commission's Second Supplemental Response to Debtors' Applications to Show Cause Why Texas Health and Human Services Should Not be Held in Contempt and Response to Further Status Report Dated June 19, 2019 [Docket No. 1516; Filed 7/10/2019]

Status: This matter will go forward as a status conference.

MATTERS NOT GOING FORWARD

4. Orix Real Estate Capital, LLC's Motion for Adequate Protection [Docket No. 1212; Filed 05/30/2019]

Related Document(s):

- a) Notice of Hearing on Orix Real Estate Capital, LLC's Motion for Adequate Protection [Docket No. 1239; Filed 06/30/2019]
- b) Agreed Motion to Continue Hearing and Extend Response Deadline to Orix Real Estate Capital, LLC's Motion for Adequate Protection [Docket No. 1403; Filed 06/21/2019]
- c) Notice of Continued Hearing [Docket No. 1470; Filed 07/01/2019]
- d) Notice of Orix Real Estate Capital, LLC's Issuance of Discovery to Debtors [Docket No. 1484; Filed 07/03/2019]
- e) Second Agreed Motion to Continue Hearing and Extend Response Deadline to Orix Real Estate Capital, LLC's Motion for Adequate Protection [Docket No. 1514; Filed 07/09/2019]
- f) Notice of Continued Hearing [Docket No. 1518; Filed 07/10/2019]

Response(s) Received:

- g) CIBC Bank USA's Objection to Orix Real Estate Capital, LLC's Motion for Adequate Protection [Docket No. 1512; Filed 07/09/2019]
- h) Objection of the Official Committee of Unsecured Creditors of Senior Care Centers, LLC, *et al.* to Orix Real Estate Capital, LLC's Motion for Adequate Protection [Docket No. 1515; Filed 07/09/2019]
- i) Debtors' Objection to Orix Real Estate Capital, LLC's Motion for Adequate Protection [Docket No. 1524; Filed 07/11/2019]

Status: This matter will not go forward.

Dated: August 6, 2019
Dallas, Texas

Respectfully submitted,

POLSINELLI PC

/s/ Trey A. Monsour

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